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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 EXXON MOBIL CORPORATION,

Case No. 2:22-cv-03225(DMG MRWx)

17 Petitioner/Plaintiff,

**DECLARATION OF MICHAEL
LYONS IN SUPPORT OF
MOTION TO INTERVENE**

v.

18 SANTA BARBARA COUNTY
19 BOARD OF SUPERVISORS,

Hon. Dolly Gee

20 Respondent/Defendant,

21 and

Hearing: October 21, 2022
Time: 9:30 a.m.
Place: Courtroom 8C,
350 West 1st Street, Los Angeles

22 ENVIRONMENTAL DEFENSE
23 CENTER, GET OIL OUT!, SANTA
24 BARBARA COUNTY ACTION
25 NETWORK, SIERRA CLUB,
26 SURFRIDER FOUNDATION,
27 CENTER FOR BIOLOGICAL
DIVERSITY, and WISHTOYO
FOUNDATION,

28 Proposed Defendant-
Intervenors.

1 I, Michael Lyons, declare as follows:

2 1. My name is Michael Lyons. I am over 18 years old. I have personal
3 knowledge of the following facts and if called as a witness, would testify to these
4 facts under oath.

5 2. I currently live in Santa Barbara and have lived in Santa Barbara
6 County for 53 years.

7 3. I have been a member of Get Oil Out! for 23 years; I remain a
8 current member and am the current Board president.

9 4. Founded in response to the devastating 1969 Santa Barbara Oil Spill,
10 Get Oil Out!'s mission for the past 50 years has been to rid the Santa Barbara
11 Channel of existing oil development and to prevent any new oil projects from
12 being approved in order to prevent oil spills and any other environmental
13 degradation in the Santa Barbara Channel and surrounding region. As provided
14 in our bylaws, Get Oil Out's purpose includes preserving and conserving Santa
15 Barbara's unique natural environment, scenic beauty, and resources by opposing
16 offshore and onshore fossil fuel development which pose a significant danger to
17 that environment.

18 5. I am an avid outdoorsman and I frequently use and recreate directly
19 in and around the area where the oil trucks will be operating. My uses in this area
20 consist of surfing, bike riding, running, hiking, fishing, swimming, bird watching,
21 camping, star gazing, photography, mobile working, driving and picnicking, to
22 name a few. Specifically, I regularly use and enjoy the Naples coastal bluffs and
23 trails, El Capitan State Park/Beach, Refugio State Park/Beach, Gaviota State Park
24 and Beach, Gaviota Peak, and Nojoqui Falls Park.

25 6. I regularly drive where the oil trucks will be operating along
26 Highway 101. I do not think the highway where the oil trucks are operating can
27 support the additional traffic.

1 7. If ExxonMobil's project were allowed to proceed, the additional use
2 of Highway 101 and Route 166 for trucking oil would cause an increase in traffic
3 and accidents that would hinder my ability to enjoy, use, and recreate in and
4 around the areas of concern. I am also very concerned for my own safety and for
5 the safety of my family, friends and community members that also recreate along
6 and use these highways. I fear that the increased highway use for oil trucking
7 creates unnecessary danger and potential harm to me directly and all who use the
8 highway. I share this concern personally and on behalf of Get Oil Out!.

9 8. The trucking of oil on the local highways as was proposed is exactly
10 the sort of activity that Get Oil Out! opposes. The threat and danger to the
11 surrounding environment and community is severe and certain.

12 9. Get Oil Out! retained the Environmental Defense Center to represent
13 our organization in opposing the ExxonMobil trucking project before the
14 Planning Commission and Board of Supervisors. On behalf of Get Oil Out!, EDC
15 submitted detailed comments at every stage of the environmental review and
16 administrative process detailing our concerns about the project and urging its
17 denial. In addition, I also personally attended and testified at hearings.

18 10. Get Oil Out! seeks to intervene in ExxonMobil's lawsuit challenging
19 the County's denial of its trucking proposal. Get Oil Out! members' interests and
20 my personal and professional interests are specifically threatened because the
21 proposed oil trucking would increase the risk of oil spills, harm to wildlife,
22 waters, and cultural resources and lead to more accidents. A court order
23 upholding Santa Barbara County's decision will ensure the safety of its residents
24 and protection of the environment and would make me feel personally much
25 safer. If the decision is not upheld, drivers and our local environment will be put
26 at considerable risk from traffic accidents and oil spills, which would decrease my
27 own use and enjoyment of the area.

28

1 I declare under penalty of perjury that the foregoing is true and correct to
2 the best of my knowledge, information, and belief.

3 Executed at Santa Barbara, California, on August 25, 2022.

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6 Michael Lyons, President – Get Oil Out!
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